

# **PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY**

**R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Old Route 30 West  
Warsaw, Indiana 46586**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 085-15579-00009	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 20, 2002

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a publication rotogravure printing operation.

Responsible Official:	Grant McGuire
Source Address:	Old Road 30 West, Warsaw, IN 46586
Mailing Address:	P.O. Box 837, Warsaw, IN 46586
General Source Phone Number:	574-267-7101
SIC Code:	2754
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) cyclone, identified as WPC-1;
- (b) One (1) cyclone, identified as WPC-2;
- (c) The modification of the existing waste paper concentrator WPCON-3, controlled by a baghouse WPBH, with primary connection to cyclone WPC-1 with the ability to connect to WPC-2;
- (d) The modification of the existing waste paper concentrator WPCON-4, which has a maximum capacity of 10,500 pounds per hour (lb/hr) with primary connection to cyclone WPC-1 with the ability to connect to cyclone WPC-2; and
- (e) The modification of the existing waste paper concentrator, identified as WPCON-5, with a maximum capacity of 10,500 pounds of paper per hour (lb/hr) with primary connection to cyclone WPC-1 with the ability to connect to cyclone WPC-2.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Definitions [326 IAC 2-7-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2      Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.3      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.4      Significant Source Modification [326 IAC 2-7-10.5(h)]**

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
  - (1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.
  - (2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.
  - (3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

#### **C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

#### **C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

#### **C.12 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.



- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) cyclone, identified as WPC-1
- (b) One (1) cyclone, identified as WPC-2
- (c) The modification of the existing waste paper concentrator WPCON-3, controlled by a baghouse WPBH, with primary connection to cyclone WPC-1 with the ability to connect to WPC-2;
- (d) The modification of the existing waste paper concentrator WPCON-4, which has a maximum capacity of 10,500 pounds per hour (lb/hr) with primary connection to cyclone WPC-1 with the ability to connect to cyclone WPC-2; and
- (e) The modification of the existing waste paper concentrator, identified as WPCON-5, with a maximum capacity of 10,500 pounds of paper per hour (lb/hr) with primary connection to cyclone WPC-1 with the ability to connect to cyclone WPC-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall not exceed 26.00 pounds per hour when operating at a process weight rate of 31,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour

### D.1.2 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) PM and PM-10 emissions from the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to 1.0 lb/ton and 0.6 lb/ton, respectively. Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable and also satisfy the requirement of Condition D.1.1.
- (b) Any change or modification to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, that may increase potential emissions to greater than twenty-five (25) tons per year of PM, or fifteen (15) tons per year of PM-10, must have prior approval from the Office of Air Quality.
- (c) The input of paper to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of PM to less than 25 tons per 12 consecutive month period and PM10 to less than 15 tons per 12 consecutive month period. Compliance with this limit shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.4 Visible Emissions Notations**

- (a) Visible emission notations of the waste paper collection system stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. During inclement weather visible emission readings are not necessary. However, notations must be made.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

**D.1.5 Cyclone Inspections**

An inspection shall be performed each calendar quarter of the two (2) cyclones (WPC-1 and WPC-2) and the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

**D.1.6 Cyclone Failure Detection**

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.7 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.2(c), the Permittee shall maintain monthly records of paper throughput to the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) and the two (2) cyclones (WPC-1 and WPC-2).

- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the waste paper collection system stack exhaust.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: Old Route 30 West, Warsaw, IN 46586  
Mailing Address: P.O. Box 837, Warsaw, IN 46586  
Source Modification No.: 085-15579-00009

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION QUARTERLY REPORT**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: Old Route 30 West, Warsaw, IN 46586  
Mailing Address: P.O. Box 837, Warsaw, IN 46586  
Source Modification No.: 085-15579-00009  
Facility: Three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) and the two (2) cyclones (WPC-1 and WPC-2).  
Parameter: PM and PM10  
Limit: The input of paper to each of these processes, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Paper Input This Month	Paper Input Previous 11 Months	Paper Input 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section  
Office Of Air Management  
100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015

R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
P.O. Box 837  
Warsaw, Indiana 46586

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)

3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)

knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)

4. I hereby certify that R.R. Donnelley & Sons Company, Warsaw, IN 46586, Old Road 30 West, Warsaw, Indiana, 46586, has constructed the two cyclones (WPC-1 and WPC-2) and modified the three waste paper concentrators (WPCON-3, WPCON-4 and WPCON-5) in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on February 8, 2002 and as permitted pursuant to **Source Modification No. 085-15579-00009** issued on \_\_\_\_\_

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Significant Source Modification to a Part 70 Operating Permit

Source Name:	R.R. Donnelley & Sons Company - Warsaw Manufacturing Division
Source Location:	Old Route 30 West, Warsaw, IN 46586
County:	Kosciusko
Construction Permit No.:	SSM 085-15579-00009
SIC Code:	2754
Permit Reviewer:	NH/EVP

On May 11, 2002, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that R.R. Donnelley & Sons Company - Warsaw Manufacturing Division had applied for a modification to their publication rotogravure printing operation. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 7, 2002, Grant McGuire, V.P. Division Director at R.R. Donnelley & Sons Company submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

#### **Comment 1**

#### **Technical Support Document**

#### **Potential to Emit After Controls for the Modification**

The table in this section has been modified to clarify that the emissions limit applies to the entire waste paper collection system, including cyclones WPC-1 and WPC-2 and waste paper concentrators WPCON-3, WPCON-4 and WPCON-5.

#### **State Rule Applicability - Individual Facilities**

The description of the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration) has been modified to clarify that enforceable limits of 25 tons/yr for PM and 15 tons/yr for PM10 have been taken to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

The description of 326 IAC 6-3-2 (Process Operations) has been modified to clarify that the process weight formula of:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

applies to entire waste paper collection system, including cyclones WPC-1 and WPC-2 and waste paper concentrators WPCON-3, WPCON-4, and WPCON-5.

## Compliance Requirements

Item 1(a) of this section has been modified to require only weekly visible emissions observations of the waste paper collection system stack exhaust. Given the visible emissions from this system are well below the regulatory requirement of 40% opacity, there is no justification for requiring the daily visible emissions observations as currently specified in the TSD and permit. Weekly observations of visible emissions for this source will be more than adequate to document compliance with this opacity standard.

Item 1(b) of this section has been modified to simplify the language, while still requiring inspections of the cyclones and concentrators once per quarter when these units are exhausting to the atmosphere.

## Response 1

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The TSD will not be revised as stated above. The comments made have been addressed in Comments 2, 3 and 5.

## Comment 2

Condition D.1.1 - Particulate Matter (PM)

This condition has been modified to clarify that the process weight formula of:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

applies to entire waste paper collection system, including cyclones WPC-1 and WPC-2 and waste paper concentrators WPCON-3, WPCON-4, and WPCON-5.

## Response 2

The following changes have been made to Condition D.1.1.

### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the three (3) waste **paper** concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 **and the two (2) cyclones WPC-1 and WPC-2**, shall not exceed 26.00 pounds per hour when operating at a process weight rate of 31,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour;} \\ \text{and } P = \text{process weight rate in tons per hour}$$

### Comment 3

#### Condition D.1.2 - PSD Limit

This condition has been modified to clarify that enforceable limits of 25 tons/yr for PM and 15 tons/yr for PM10 have been taken to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable, and that a change to the waste paper collection system, including the waste paper concentrators and cyclones, that would increase potential emissions to greater than twenty-five (25) tons per year of PM, or fifteen (15) tons per year of PM-10, must have prior approval from the Office of Air Quality.

### Response 3

The ton/yr limits cannot be tested and therefore are not enforceable. The lb/ton limits are being revised and a throughput limit is being added to Condition D.1.2.

#### D.1.2 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

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- (a) PM and PM-10 emissions from the three (3) waste **paper** concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 **and the two (2) cyclones WPC-1 and WPC-2**, shall be limited to ~~0.36~~ **1.0** lb/ton and ~~0.22~~ **0.6** lb/ton, respectively. Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable and also satisfy the requirement of Condition D.1.1.
- (b) Any change or modification to the three (3) waste **paper** concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 **and the two (2) cyclones WPC-1 and WPC-2**, that may increase potential emissions to greater than twenty-five (25) tons per year of PM, or fifteen (15) tons per year of PM-10, must have prior approval from the Office of Air Quality.
- (c) **The input of paper to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of PM to less than 25 tons per 12 consecutive month period and PM10 to less than 15 tons per 12 consecutive month period. Compliance with this limit shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.**

A new reporting Condition D.1.8 has been added to the permit to show compliance with Condition D.1.2(c). A new reporting form has also been added to the permit.

#### D.1.8 Reporting Requirements

---

**A quarterly summary of the information to document compliance with Condition D.1.2(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

#### Comment 4

##### Condition D.1.4 - Particulate Matter (PM)

Although the waste paper concentrators exhaust through the cyclones, the cyclones do not act as control devices for the concentrators. The emissions from the system are based on any paper passing through the cyclones resulting in the same emissions as those generated by the paper passing through the concentrators. This condition is therefore incorrect and should be deleted, along with the heading "Compliance Determination Requirements".

#### Response 4

Condition D.1.4 will be removed from the permit and the rest of Section D.1 will be re-numbered accordingly.

#### ~~Compliance Determination Requirements~~

##### ~~D.1.4 Particulate Matter (PM)~~

---

~~In order to comply with D.1.1, the two cyclones for PM control shall be in operation and control emissions from the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) at all times that the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) are in operation.~~

#### Comment 5

##### Condition D.1.5 - Visible Emissions Notations

Similar to Item 1(a) of the Compliance Requirements section of the TSD, this condition has been modified to require only weekly visible emissions observations of the waste paper collection system stack exhaust. Given the visible emissions from this system are well below the regulatory requirement of 40% opacity, there is no justification for requiring the daily visible emissions observations as currently specified in the TSD and permit. Weekly observations of visible emissions for this source will be more than adequate to document compliance with this opacity standard.

#### Response 5

The following changes have been made to Condition D.1.5 (now re-numbered D.1.4).

##### D.1.54 Visible Emissions Notations

- 
- (a) ~~Daily~~ **Visible emission notations of the waste paper collection system stack exhaust shall be performed **once per shift** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. **During inclement weather visible emission readings are not necessary. However, notations must be made.****
  - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### Comment 6

##### Condition D.1.6 - Cyclone Inspections

Similar to Item 1(b) the Compliance Requirements section of the TSD, this condition has been modified to simplify the language, while still requiring inspections of the cyclones and concentrators once per quarter when these units are exhausting to the atmosphere.

#### Response 6

The following changes have been made to Condition D.1.6 (now re-numbered D.1.5).

##### D.1.65 Cyclone Inspections

An inspection shall be performed each calendar quarter of ~~all the~~ **the two (2) cyclones (WPC-1 and WPC-2) and controlling** the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### Comment 7

##### Condition D.1.8 - Record Keeping Requirements

A new requirement (a) has been added to include a requirement to maintain monthly records of total paper throughput of the waste paper collection system to document compliance with the PM and PM-10 emissions limitation and to define how emissions from the system will be determined from the throughput data.

#### Response 7

The following changes have been made to Condition D.1.8 (now re-numbered D.1.7).

##### D.1.87 Record Keeping Requirements

- (a) **To document compliance with Condition D.1.2(c), the Permittee shall maintain monthly records of paper throughput to the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) and the two (2) cyclones (WPC-1 and WPC-2).**
- (~~a~~b) To document compliance with Condition D.1.54, the Permittee shall maintain records of daily visible emission notations of the ~~three (3)~~ waste paper ~~concentrators~~ **collection system** stack exhaust.
- (~~b~~c) To document compliance with Condition D.1.65, the Permittee shall maintain records of the results of the inspections required under Condition D.1.65 and the dates the vents

are redirected.

- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Significant Source Modification to a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	R.R. Donnelley & Sons Company - Warsaw Manufacturing Division
<b>Source Location:</b>	Old Route 30 West, Warsaw, IN 46586
<b>County:</b>	Kosciusko
<b>SIC Code:</b>	2754
<b>Operation Permit No.:</b>	T085-6040-00009
<b>Operation Permit Issuance Date:</b>	Pending
<b>Source Modification No.:</b>	085-15579-00009
<b>Permit Reviewer:</b>	NH/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from R.R. Donnelley & Sons Company - Warsaw Manufacturing Division relating to the operation of a publication rotogravure printing operation.

#### History

On February 8, 2002, R.R. Donnelley & Sons Company - Warsaw Manufacturing Division submitted an application to the OAQ requesting modifications to their existing plant. The modifications consist of the following:

- (a) Replacement of the existing cyclones, identified as WPC-1 and WPC-2, each with a capacity of 30,000 CFM with two new cyclones, identified as WPC-1 and WPC-2, each with a capacity of 40,000 CFM;
- (b) Modification of waste paper concentrator, identified as WPCON-3, controlled by baghouse WPBH, with exhaust normally returning to the interior of the building, to now instead be connected to WPC-1 with the ability to connect to WPC-2;
- (c) Modification of waste paper concentrator, identified as WPCON-4, with primary connection to WPC-1 with the ability to connect to WPC-2. Currently this concentrator's primary connection is WPC-2; and
- (d) Modification of waste paper concentrator, identified as WPCON-5, with primary connection to WPC-1 with the ability to connect to WPC-2. Currently this concentrator is to feed into WPCON-4 which feeds into the existing WPC-1 or WPC-2.

### **New Emission Units and Pollution Control Equipment**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

- (a) One (1) cyclone, identified as WPC-1;
- (b) One (1) cyclone, identified as WPC-2;
- (c) The modification of the existing waste paper concentrator WPCON-3, controlled by a baghouse WPBH, with primary connection to cyclone WPC-1 with the ability to connect to WPC-2;
- (d) The modification of the existing waste paper concentrator WPCON-4, which has a maximum capacity of 10,500 pounds per hour (lb/hr) with primary connection to cyclone WPC-1 with the ability to connect to cyclone WPC-2; and
- (e) The modification of the existing waste paper concentrator, identified as WPCON-5, with a maximum capacity of 10,500 pounds of paper per hour (lb/hr) with primary connection to cyclone WPC-1 with the ability to connect to cyclone WPC-2.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

### **Existing Approvals**

The source applied for a Part 70 Operating Permit (085-6040-00009) on June 3, 1996. The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP-43-07-88-0199, issued on October 23, 1984;
- (b) OP-43-07-88-0200, issued on October 23, 1984;
- (c) OP-43-07-88-0201, issued on October 23, 1984;
- (d) OP-43-07-88-0202, issued on October 23, 1984;
- (e) OP-43-07-88-0207, issued on January 14, 1986;
- (f) OP-2300-0009-0219, issued on July 18, 1990;
- (g) CP-085-3117-00009, issued on December 10, 1993;
- (h) CP-085-3698-00009, issued on June 30, 1994;
- (i) CP-085-4396-00009, issued on November 27, 1995;
- (j) CP-085-6372-00009, issued on December 6, 1996;
- (k) Amendment 085-8369-00009, issued on April 4, 1997;
- (l) CP-085-8398-00009, issued on April 8, 1997;
- (m) Modification 085-8155-00009, issued on June 2, 1997;
- (n) CP-085-8550-00009, issued on September 18, 1997;
- (o) Amendment 085-10207-00009, issued on December 1, 1998;
- (p) Amendment 085-10487-00009, issued on January 20, 1999;
- (q) SSM 085-10668-00009, issued May 16, 2000;
- (r) SPM 085-11652-00009, issued March 31, 2000;
- (s) Amendment 085-12261, issued August 9, 2000;
- (t) Minor Source Modification 085-14293-00009, issued on July 10, 2001; and
- (u) Administrative Amendment 085-15513-00009, issued on March 4, 2002.

### **Enforcement Issue**

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 8, 2002.

## Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Appendix A, page 1).

## Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	262.8
PM-10	26.28
SO <sub>2</sub>	--
VOC	--
CO	--
NO <sub>x</sub>	--

## Justification for Modification

The unrestricted potential to emit of PM and PM10 is greater than 25 tons per year, thus a significant source modification is required pursuant to 326 IAC 2-7-10.5(f)(4). This Significant Source Modification will give the source approval to construct and operate the new emission units.

## County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone.

## Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	11.15
PM-10	2.00
SO <sub>2</sub>	0.00
VOC	350.00
CO	9.00
NO <sub>x</sub>	35.000

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions were based on the Annual Air Emission Inventory and Emission Statement for 1999.

## Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Cyclones WPC-1 and WPC-2	25.00*	15.00*	--	--	--	--	--
PSD Threshold	25	15	40	40	100	40	N/A

\* The source is limiting its limited potential to emit less than applicable PSD significant emission levels for PM and PM10 to avoid the requirements of 326 IAC 2-2.

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

This proposed modification is not considered a major modification because the source has agreed to limit its limited potential to emit less than applicable PSD significant emission levels for PM and PM10. This equates to a 0.36 lb/ton limit for PM and a 0.22 lb/ton limit for PM10. Compliance with these limits makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the three (3) waste concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (15.75)^{0.67} = 26.00 \text{ lbs PM/hr}$$

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The waste paper collection system has the applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emissions notations of the waste paper collection system stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
  - (b) An inspection shall be performed each calendar quarter of all cyclones controlling the three (3) waste paper concentrators when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
  - (c) Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the two (2) cyclones (WPC-1 and WPC-2) for the three (3) waste paper concentrators must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## Conclusion

The operation of this publication rotogravure printing operation shall be subject to the conditions of the attached proposed **Significant Source Modification No. 085-15579-00009**.

**Appendix A: Emissions Calculations**

Page 1 of 1 TSD App A

**Company Name:** R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
**Address City IN Zip:** Old Route 30 West, Warsaw, IN 46586  
**Title V Significant Source Modification:** 085-15579  
**Plt ID:** 085-00009  
**Reviewer:** NH/EVP

calculated as  
follows:

Pounds of Air Moved  
40,000 cubic feet per minute x 60 minutes/hour x 0.075 pounds of air/cubic foot = 180000 pound of air/hour

Pounds of Material Processed  
180,000 pounds of Air / 3 = 60000 pounds of paper per hour

or cyclone:

60,000 lbs/hr x 1 lb. dust/2,000 lb. paper = 30 lb PM/hr \* 2 cyclones = 60 lb PM/hr

60 lb PM/hr x 8760 hr/yr = 525600 lb PM/2000 lb per ton  
**PTE = 262.80 tons PM/yr**  
**PTE of PM10 = 26.28 tons PM10/yr**

tons/year

pounds per  
ton is used.

48,400 tons/yr waste paper processed x 2 lb. (assuming waste paper handled twice)/2,000 lb. Paper = 48.40 tons/yr

**Limited Emissions = 48.40 tons PM/year (of which 4.84 tons PM10/yr)**